



David E. Gottlieb

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VIA ECF

The Honorable Michael J. Roemer
United States District Court
Western District of New York
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, NY 14202

Re: *Grand'Maison v. Roswell Park Comprehensive Cancer Center, et al.*;
No. 23 Civ. 00099 (JLS) (MJR)

Dear Judge Roemer:

We represent Plaintiff Dr. Anne Grand'Maison and write in response to Defendants' letter motion regarding discovery disputes (Dkt. No. 46). As Plaintiff mentioned to defense counsel just prior to Defendants' letter motion, a substantial document production was to be forthcoming. As Plaintiff had also mentioned to Defendants, part of the reason for delay in discovery in this matter had been Plaintiff's counsel's lengthy medical issue, surgery and medical leave in the second half of 2023. Since Defendants' letter motion, Plaintiff's counsel has produced over 3,500 documents. Additional documents that had to be further reviewed for privilege, as well as responsive audio recordings, will be produced shortly as well. Plaintiff does not expect there to be any substantial withholding of documents on the basis of privilege but will provide a privilege log in accordance with her discovery obligations. Defendants' recent deficiency letter did not mention any further disputes as to Plaintiff's interrogatory responses, but Plaintiff's counsel is happy to confer with Defendants about any claimed deficiencies.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "David E. Gottlieb", enclosed within a light blue circular stamp.

David E. Gottlieb

cc: All Counsel of Record (via ECF)